

ESTTA Tracking number: **ESTTA754371**

Filing date: **06/24/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

## Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

### Opposer Information

Name	Parker Intangibles LLC
Granted to Date of previous extension	07/02/2016
Address	6035 Parkland Blvd Cleveland, OH 44124 UNITED STATES

Attorney information	ROBERT J CLARK 6035 PARKLAND BLVD CLEVELAND, OH 44124 UNITED STATES rclark@parker.com Phone:2168962790
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### Applicant Information

Application No	86843107	Publication date	05/03/2016
Opposition Filing Date	06/24/2016	Opposition Period Ends	07/02/2016
Applicant	DUNBARTON INTERNATIONAL GROUP INC. SUITE 804, 1220 N.MARKET STREET WILMINGTON, NEW CASTLE, DE 19801 UNITED STATES		


### Goods/Services Affected by Opposition

Class 007. First Use: 2015/08/01 First Use In Commerce: 2015/08/01 All goods and services in the class are opposed, namely: Electric jacks; Electronically and power-operated tools, namely, pullers and components therefor, nut splitters, extractors, separators, spanners and coil spring compressors; Hydraulic jacks; Hydraulic pumps; Hydraulic pumps and motors for hydrostatic systems, comprised of pumps, motors, valves, switches, sensors and electronic controls, for hydraulic drives and force transmission in machines, machine tools, grinding and food processing machines and in off-road-vehicles; Pneumatic jacks; Pneumatic pumps; Power-driven wrenches; Power-operated jacks; Replacement parts for machines, namely, replacement parts for trench excavators, drag-line excavators, hoisting machines, locomotive cranes, shoveling machines, power shovels and log handling machines, namely, chassis parts, hydraulic and pneumatic parts
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### Grounds for Opposition


Priority and likelihood of confusion	Trademark Act Section 2(d)
Dilution by blurring	Trademark Act Sections 2 and 43(c)
Dilution by tarnishment	Trademark Act Sections 2 and 43(c)
Fraud on the USPTO	In re Bose Corp., 580 F.3d 1240, 91 USPQ2d 1938 (Fed. Cir. 2009)

## Marks Cited by Opposer as Basis for Opposition


U.S. Registration No.	1087173	Application Date	07/16/1975
Registration Date	03/14/1978	Foreign Priority Date	NONE
Word Mark	PARKER		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 004. First use: First Use: 1975/07/11 First Use In Commerce: 1975/07/11 LUBRICANTS FOR ELASTOMERIC PACKINGS, TUBE AND HOSE COUPLING PARTS, VALVES AND CYLINDERS</p> <p>Class 006. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 METAL FITTINGS AND COUPLINGS FOR TUBES,HOSES AND PIPES, METAL VALVES THAT ARE MANUALLY OPERATED, IMPACT EXTRUSIONS, METAL GASKETS, AND SPRAY NOZZLES OF METAL</p> <p>Class 007. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 HYDRAULIC SYSTEM PARTS, PNEUMATIC SYSTEM PARTS, AUTOMATIC VALVES THAT ARE PARTSO F MACHINES, RIVETING MACHINES, POWER OPERATED TUBE AND HOSE WORKING MACHINES, AND MACHINE BELTING</p> <p>Class 008. First use: First Use: 1975/07/10 First Use In Commerce: 1975/07/10 MANUALLY OPERATED TUBE AND HOSE WORKINGTOOLS AND MANUALLY OPERATED OIL AND GREASE DISPENSERS</p> <p>Class 009. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 RADIO ANTENNAS, ELECTRICALLY OPERATED VALVES, ELECTRICAL SWITCHES FOR SIGNAL DEVICES, FIRE PREVENTION APPARATUS FOR AIRCRAFT FUEL TANKS COMPRISING MEANS FOR AUTOMATICALLY INTRODUCING NITROGEN INTO THE TANK, AND HYDRAULIC STANDS FOR TESTINGFLUID SYSTEM COMPONENTS</p> <p>Class 011. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 REFRIGERATION AND AIR CONDITIONING PARTS AND TUBULAR HEAT EXCHANGERS FOR FLUIDS</p> <p>Class 012. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 [ PARTS AND FITTINGS FOR AUTOMOBILES COMPRISING REAR VIEW MIRRORS, WINDSHIELD WIPERS, LICENSE PLATE FRAMES, AND TIRE REPAIR PLUGS ]</p> <p>Class 017. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 TUBES AND HOSES OF RUBBER OR PLASTIC, NON-METALLIC SEALS AND PACKINGS, AND NON-METALLIC FITTINGS AND COUPLINGS FOR</p>		

TUBES AND HOSES	
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U.S. Registration No.	855404	Application Date	03/24/1966
Registration Date	08/27/1968	Foreign Priority Date	NONE
Word Mark	PH		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 006. First use: First Use: 1957/12/00 First Use In Commerce: 1957/12/00 VALVED QUICK COUPLERS AND FUEL SPRAY NOZZLES METAL FORGING AND DIE CASTINGS</p> <p>Class 011. First use: First Use: 1963/12/00 First Use In Commerce: 1963/12/00 STRAINERS, FILTERS, AIR LINE FILTERS, AND DRIERS FOR REFRIGERATION EQUIPMENT</p> <p>Class 017. First use: First Use: 1957/12/00 First Use In Commerce: 1957/12/00 O-RINGS, PACKINGS, GASKETS, AND FLEXIBLE HOSE</p> <p>Class U023 (International Class 007, 008). First use: First Use: 1957/12/00 First Use In Commerce: 1957/12/00</p> <p>FLUID PRESSURE OPERATED MOTORS, PUMPS FOR HYDRAULIC POWER SYSTEMS, HYDRAULIC ACCUMULATORS, HYDRAULIC PRESSES, RIVETING MACHINES, TUBE BENDING MACHINES, HAND OPERATED TUBE BENDERS, TUBE CUTTERS, TUBE FLARING TOOLS, TUBE REAMERS, HOSE COUPLING ASSEMBLY MACHINES, HOSE CUTOFF MACHINES, TUBE BURRING TOOLS, FERRULE PRESETTING MACHINES, TUBE SWAGERS, LUBRICATING DEVICES, COMPRESSORS, MUFFLERS, AIR PRESSES, SHOCK ABSORBERS FOR HYDRAULIC POWER SYSTEMS, THREADING TAPS, STRAP VICES, AND WRENCHES</p>		

U.S. Registration No.	2325072	Application Date	11/18/1996
Registration Date	03/07/2000	Foreign Priority Date	NONE
Word Mark	PARKER		
Design Mark			

Description of Mark	NONE
Goods/Services	<p>Class 007. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 positive displacement pumps, oil pumps for use in motors and engines, rotary pumps, axial piston pumps, gerotor pumps, gear pumps, suction pumps, sump pumps, electric motors for machines, machine parts for handling fluids, namely, nozzles, flow dividers, filters, cylinders, pneumatic and hydraulic actuators and mechanical seals, machines for assembling fittings onto hose and tubing, machines for cutting and processing hose and tubing, valves for fluid handling machines, namely, ball valves, packless valves, bonnet valves and needle valves</p> <p>Class 009. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 electromechanical motion control systems comprised of electric actuators and programmable logic controllers sold as a unit, electric linear actuators, electric rotary actuators, programmable logic controllers, fluid condition sensors, location sensors, speed sensors, electric controllers, piston accumulators and bladder accumulators for use in hydraulic and pneumatic machines, flow regulators for use in hydraulic and pneumatic machines, pressure regulators for use in hydraulic and pneumatic machines, computer hardware, namely, programmers, and software, namely, computer programs, for programming and controlling motion control and fluid handling machines</p> <p>Class 011. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 valves for refrigerators and air conditioning, filters for the refrigerant fluid used in refrigerators and air conditioners, accumulators for receiving and storing the refrigerant fluid in refrigerators and air conditioners, and desiccant type dryers for removing water from refrigerant fluid</p> <p>Class 035. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 business management and consultation, inventory, order receiving and entering, and industrial product billing services</p> <p>Class 042. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 Technical consultation and design services for others in the field of motion control and fluid handling components and systems</p>

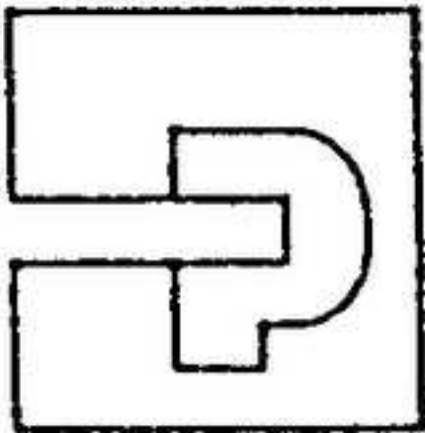
U.S. Registration No.	1061075	Application Date	07/16/1975
Registration Date	03/15/1977	Foreign Priority Date	NONE
Word Mark	P		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 004. First use: First Use: 1975/07/11 First Use In Commerce: 1975/07/11		

	<p>INDUSTRIAL OILS AND GREASES</p> <p>Class 006. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 METAL FITTINGS AND COUPLINGS FOR TUBES, HOSES AND PIPES, METAL VALVES THAT ARE MANUALLY OPERATED, METAL EXTRUSIONS AND FORGINGS, METAL GASKETS, AND SPRAY NOZZLES OF METAL</p> <p>Class 007. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 HYDRAULIC SYSTEM PARTS, PNEUMATIC SYSTEM PARTS, AUTOMATIC VALVES THAT ARE PARTS OF MACHINES, RIVETING MACHINES, POWER OPERATED TUBE AND HOSE WORKING MACHINES, AND MACHINE BELTING</p> <p>Class 008. First use: First Use: 1975/07/10 First Use In Commerce: 1975/07/10 [ MANUALLY OPERATED TUBE AND HOSE WORKING TOOLS AND MANUALLY OPERATED OIL AND GREASE DISPENSERS ]</p> <p>Class 009. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 RADIO ANTENNAS, ELECTRICALLY OPERATED VALVES, ELECTRICAL SWITCHES FOR SIGNAL DEVICES, FIRE PREVENTION APPARATUS FOR AIRCRAFT FUEL TANKS COMPRISING MEANS FOR AUTOMATICALLY INTRODUCING NITROGEN INTO THE TANK, HYDRAULIC STANDS FOR TESTING FLUID SYSTEM COMPONENTS</p> <p>Class 011. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 REFRIGERATION AND AIR CONDITIONING PARTS AND TUBULAR HEAT EXCHANGERS FOR FLUIDS</p> <p>Class 012. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 [ PARTS AND FITTINGS FOR AUTOMOBILES COMPRISING REAR VIEW MIRRORS, WINDSHIELD WIPERS, LICENSE PLATE FRAMES, AND TIRE REPAIR PLUGS ]</p> <p>Class 017. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 TUBES AND HOSES OF RUBBER OR PLASTIC, NON-METALLIC SEALS AND PACKINGS, AND NON-METALLIC FITTINGS AND COUPLINGS FOR TUBES AND HOSES</p>
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U.S. Registration No.	1087174	Application Date	07/16/1975
Registration Date	03/14/1978	Foreign Priority Date	NONE
Word Mark	PARKER		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 004. First use: First Use: 1975/07/11 First Use In Commerce: 1975/07/11 LUBRICANTS FOR ELASTOMERIC PACKINGS, TUBE AND HOSE COUPLING PARTS, VALVES AND CYLINDERS		

	<p>Class 006. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 METAL FITTINGS AND COUPLINGS FOR TUBES,HOSES AND PIPES, METAL VALVES THAT ARE MANUALLY OPERATED, IMPACT EXTRUSIONS, METAL GASKETS, AND SPRAY NOZZLES OF METAL</p> <p>Class 007. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 HYDRAULIC SYSTEM PARTS, PNEUMATIC SYSTEM PARTS, AUTOMATIC VALVES THAT ARE PARTSOF MACHINES, RIVETING MACHINES, POWER OPERATED TUBE AND HOSE WORKING MACHINES, AND MACHINE BELTING</p> <p>Class 008. First use: First Use: 1975/07/10 First Use In Commerce: 1975/07/10 MANUALLY OPERATED TUBE AND HOSE WORKINGTOOLS AND MANUALLY OPERATED OIL AND GREASE DISPENSERS</p> <p>Class 009. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 RADIO ANTENNAS, ELECTRICALLY OPERATED VALVES, ELECTRICAL SWITCHES FOR SIGNAL DEVICES, FIRE PREVENTION APPARATUS FOR AIRCRAFT FUEL TANKS COMPRISING MEANS FOR AUTOMATICALLY INTRODUCING NITROGEN INTO THE TANK, AND HYDRAULIC STANDS FOR TESTINGFLUID SYSTEM COMPONENTS</p> <p>Class 011. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 REFRIGERATION AND AIR CONDITIONING PARTS AND TUBULAR HEAT EXCHANGERS FOR FLUIDS</p> <p>Class 012. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 [ PARTS AND FITTINGS FOR AUTOMOBILES COMPRISING REAR VIEW MIRRORS, WINDSHIELD WIPERS, LICENSE PLATE FRAMES, AND TIRE REPAIR PLUGS ]</p> <p>Class 017. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 TUBES AND HOSES OF RUBBER OR PLASTIC, NON-METALLIC SEALS AND PACKINGS, AND NON-METALLIC FITTINGS AND COUPLINGS FOR TUBES AND HOSES</p>
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U.S. Registration No.	1054192	Application Date	07/16/1975
Registration Date	12/14/1976	Foreign Priority Date	NONE
Word Mark	P		

Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 004. First use: First Use: 1975/07/11 First Use In Commerce: 1975/07/11 INDUSTRIAL OILS AND GREASES</p> <p>Class 006. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 METAL FITTINGS AND COUPLINGS FOR TUBES,HOSES AND PIPES, METAL VALVES THAT ARE MANUALLY OPERATED, METAL EXTRUSIONS AND FORGINGS, METAL GASKETS, AND SPRAY NOZZLES OF METAL</p> <p>Class 007. First use: First Use: 1975/06/30 First Use In Commerce: 1975/06/30 HYDRAULIC SYSTEM PARTS, PNEUMATIC SYSTEM PARTS, AUTOMATIC VALVES THAT ARE PARTSOF MACHINES, RIVETING MACHINES, POWER OPERATED TUBE AND HOSE WORKING MACHINES, AND MACHINE BELTS</p> <p>Class 008. First use: First Use: 1975/07/10 First Use In Commerce: 1975/07/10 [ MANUALLY OPERATED TUBE AND HOSE WORKING TOOLS, AND MANUALLY OPERATED OIL AND GREASE DISPENSERS ]</p> <p>Class 009. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 RADIO ANTENNAS, ELECTRICALLY OPERATED VALVES, ELECTRICAL SWITCHES FOR SIGNAL DEVICES, AND FIRE PREVENTION APPARATUS FORAIRCRAFT FUEL TANKS COMPRISING MEANS FOR AUTOMATICALLY INTRODUCING NITROGEN INTO THE TANK, AND HYDRAULIC STANDS FOR TESTING FLUID SYSTEM COMPONENTS</p> <p>Class 011. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 REFRIGERATION AND AIR CONDITIONING PARTS AND TUBULAR HEAT EXCHANGERS FOR FLUIDS</p> <p>Class 012. First use: First Use: 1975/07/09 First Use In Commerce: 1975/07/09 [ PARTS AND FITTINGS FOR AUTOMOBILES COMPRISING REAR VIEW MIRRORS, WINDSHIELD WIPERS, LICENSE PLATE FRAMES, AND TIRE REPAIR PLUGS ]</p> <p>Class 017. First use: First Use: 1975/07/01 First Use In Commerce: 1975/07/01 TUBES AND HOSES OF RUBBER OR PLASTIC, NON-METALLIC SEALS AND PACKINGS, AND NON-METALLIC FITTINGS AND COUPLINGS FOR</p>

	TUBES AND HOSES
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Attachments	73057778#TMSN.png( bytes ) 72241797#TMSN.png( bytes ) 75199248#TMSN.png( bytes ) 73057781#TMSN.png( bytes ) 73057780#TMSN.png( bytes ) 73057779#TMSN.png( bytes ) Enparker.pdf(982042 bytes )
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### Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Overnight Courier on this date.

Signature	/Robert J. Clark/
Name	ROBERT J CLARK
Date	06/24/2016



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

**Notice of Opposition**

Notice is hereby given that the following parties oppose registration of the indicated application.

Opposer's Information

Name	Parker Intangibles LLC
Entity	Limited Liability Company
Address	6035 Parkland Boulevard Cleveland, OH 44124-4141 United States

Attorney Information	Robert J. Clark
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Applicant's Information

Application No.	86843107	Publication Date	05/03/2016
Opposition Filing Date	12/08/2015	Opposition Period Ends (extended)	07/02/2016

Applicant	Dunbarton International Group Inc. 1220 N. Market Street Suite 840 Wilmington, DE 19801 United States
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The grounds for opposition are as follows:

PARKER INTANGIBLES, LLC.	)	
	)	
Opposer,	)	Opposition No.
v.	)	Serial No. 86843107
	)	Mark: ENPARKER
DUNBARTON INTERNATIONAL GROUP, INC.	)	Published: 5/03/2016
	)	
Applicant.	)	
	)	

### NOTICE OF OPPOSITION

Parker Intangibles LLC ( “Opposer”), a Delaware corporation, having a principle place of business at 6035 Parkland Boulevard, Cleveland, OH 44124, believes that it is being and will be damaged by Dunbarton International Group Inc. (“Applicant”) and its registration of the mark ENPARKER shown in U.S. Application No. 86843107 and hereby opposes the same in all International Classes.

As grounds for opposition, Opposer alleges:

1. Applicant filed a trademark application assigned Serial No. 86843107 in the United States Patent and Trademark Office (“USPTO”) on December 8, 2015 (“the Application”) to register the mark ENPARKER (“Applicant’s ENPARKER Mark”). The mark consists of the stylized wording of “ENPARKER.” A reproduction of Applicant’s ENPARKER Mark is provided below:

**ENPARKER**



2. Applicant is a Delaware Corporation with an address of 1220 N. Market Street, Suite 804, Wilmington, Delaware 19801.



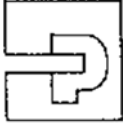
3. Applicant filed under International Class 7, covering the following products (collectively,

“Applicant’s Products”):

International Class 7: Electric jacks; Electronically and power-operated tools, namely, pullers and components therefor, nut splitters, extractors, separators, spanners and coil spring compressors; Hydraulic jacks; Hydraulic pumps; Hydraulic pumps and motors for hydrostatic systems, comprised of pumps, motors, valves, switches, sensors and electronic controls, for hydraulic drives and force transmission in machines, machine tools, grinding and food processing machines and in off-road-vehicles; Pneumatic jacks; Pneumatic pumps; Power-driven wrenches; Power-operated jacks; Replacement parts for machines, namely, replacement parts for trench excavators, drag-line excavators, hoisting machines, locomotive cranes, shoveling machines, power shovels and log handling machines, namely, chassis parts, hydraulic and pneumatic parts.

4. The Application was published for opposition on May 3, 2016 in the *Official Gazette*.
5. Commencing prior to Applicant’s filing date, Parker, has engaged in the manufacturing of motion and control technologies. Founded in 1918, Parker is divided into several operating groups including Aerospace, Automation, Engineered Materials, and Hydraulics.
6. The Opposer is owner of several marks in association with its hydraulic and pneumatic parts and systems, including U.S. Registration No. 73057778 for the mark “Parker” (“Opposer’s Mark”), registered on March 14, 1978. Registration for all of the Opposer’s mark are valid and Parker retains the right to use the marks in commerce. Reproduction of Opposer’s marks are shown below:

	<b>Serial No. 73057778</b> <b>Registered:</b> <b>03/14/1978</b>
	<b>Serial No. 72241797</b> <b>Registered:</b> <b>08/27/1968</b>
<b>PARKER</b>	<b>Serial No. 75199248</b> <b>Registered: 03/07/2000</b>

	<b>Serial No. 73057781</b> <b>Registered: 03/15/1977</b>
	<b>Serial No. 73057780</b> <b>Registered: 03/14/1978</b>
	<b>Serial No. 73057779</b> <b>Registered: 12/14/1978</b>

7. All marks are filed under International Class 7, covering at least the following products  
(collectively, “Opposer’s products):

International Class 7: hydraulic system parts, pneumatic system parts, automatic valves that are parts of machines, riveting machines, power operated tube and hose working machines, and machine belting

8. Parker has made significant expenditures in marketing and promotion of its marks in association with its high quality products, and through such promotion has generated substantial international goodwill and customer recognition.

**Count 1-Priority and Likelihood of Confusion: Section 2(d) of the Lanham Act, 15 U.S.C. §**

**1052(d)**

9. Opposer has priority based on its valid and subsisting prior registrations for its marks. Parker also has priority based on its use of the marks in connection with its global operations. The valuable goodwill built up in association with its marks commenced long before the filing date of Applicant’s ENPARKER Mark.
10. Applicant’s ENPARKER Mark is nearly identical in connotation to the Parker mark. Both contain the word ‘Parker’, and are a similar font and style of block text. Both marks identify

companies specializing in the same subset of manufactured products. Applicant's ENPARKER Mark, when applied to the Opposer's products, is likely to cause confusion resulting in damage and detriment to Opposer's reputation.

11. Purchasers and clients familiar with Opposer's services are likely to believe that the Applicant's Services are sponsored and affiliated with Opposer because the Applicant's ENPARKER Mark is confusingly similar and the Applicant is seeking to manufacture the same types of products, especially hydraulic and pneumatic parts and systems.
12. Accordingly, Applicant's ENPARKER Mark resembles Opposer's Mark so closely as to be likely, when used in connection with its Class 7 manufactured products, to cause confusion and mistake, or to deceive under Section 2(d) of the Lanham Act, 15 U.S.C. § 1052(d).

**Count 2-Fraud Section: 38 of the Lanham Act, 15 U.S.C. § 1120**

13. Opposer repeats and realleges each and every allegation set forth above.
14. Opposer is one of the world's leading manufacturers of hydraulic equipment, including pumps, crimpers, valves, and hoses. Several of the Opposer's marks, including U.S. Registration No. 73057778, are associated with these products.
15. The term 'Enparker' has been used in connection with the sale of hydraulic equipment, particularly hydraulic hoses and crimpers, per different import/export websites, including Alibaba.com. Opposer's main consumer base, including consumers in the United States, can easily access to these websites and view these products. A simple search for Opposer's products in a standard search engine will lead to these Enparker hoses, misleading the consumer. *See Exhibit A.*
16. "Enparker" is a brand name for the items sold on those websites, specifically the hydraulic parts. They are practically identical in material makeup, size and function to the hydraulic

hoses and parts manufactured and sold by the Opposer. They can even be customized like the Opposer's hoses, for size, color, reinforcement layer, and PSI. However, although the hoses appear identical, they are likely to be of inferior quality and may damage the reputation and goodwill of the Opposer's Mark.

17. Accordingly, the term 'Enparker' is already being used with the equipment being sold on various websites, which constitutes fraud as the Applicant is making a false representation that the hoses are produced and/or certified by Opposer, as the names and products are almost identical.
18. Accordingly, Applicant in bad faith is using the 'ENPARKER' mark to deceive the USPTO and consumers about the origin of its products, under Section 38 of the Lanham Act, 15 U.S.C. § 1120.

**Count 3-Dilution: Section 43 of the Lanham Act, 15 U.S.C. §1125(c)(2)(B)**

19. Opposer repeats and realleges each and every allegation set forth above.
20. Opposer has engaged in global manufacturing and promotion and has earned massive notoriety using its distinctive and famous marks, earning a spot as a Fortune 500 corporation.
21. The degree of similarity between the Opposer's mark the Applicant's ENPARKER Mark is high and there is a very strong likelihood the Applicant was intending to create an association with Opposer due both organizations manufacturing the same subset of products.
22. Accordingly, Opposer submits that it will be damaged by the registration of Applicant's ENPARKER mark, as the mark will dilute the distinctiveness of Opposer's famous mark since it contains the whole word of the Opposer's Mark and is likely to blur the reputable quality of the Opposer's brand, in violation of Section 43(c) of the Trademark Act, 15 U.S.C. §1125(c)(2)(B).

PRAYER FOR RELIEF

**WHEREFORE**, Parker Intangibles LLC, believes that it is being damaged and will further be damaged by the registration of the Applicant's ENPARKER mark and respectfully requests the registration of the Applicant's ENPARKER mark, U.S. Trademark Application No. 86843107, be refused and that this Opposition be sustained in favor of the Opposer.

Parker Intangibles LLC submits herewith the requisite filing fee in the amount of \$300.00. The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment, to our Deposit Account No. 16-0325.

By: /Robert J. Clark/  
Robert J. Clark  
PARKER INTANGIBLES LLC  
6035 Parkland Blvd.  
Cleveland, OH 44106  
Rclark@parker.com  
216-896-2790

Dated: June 24, 2016

## Exhibit A



### Manufacturer of High Quality Shangdong Qingdao Enparker Hydraulic hose with Good Price in China

FOB Price: **US \$0.78 - 13.9 / Meter** | [Get Latest Price](#)  
 Min. Order Quantity: 1000 Meter/Meters  
 Supply Ability: 200000 Meter/Meters per Month  
 Port: Qingdao  
 Payment Terms: L/C,T/T

[Contact Supplier](#)

[Start Order](#)

[Chat Now!](#)

[Request Sample](#)



### best enparker high pressure hose

FOB Price: **US \$0.02 - 5 / Meter** | [Get Latest Price](#)  
 Min. Order Quantity: 100 Meter/Meters can be discussed  
 Supply Ability: 30000000 Meter/Meters per Month  
 Port: Shenzhen  
 Payment Terms: L/C,D/A,D/P,T/T,Western Union,MoneyGram,Escrow,Paypal

[Contact Supplier](#)

[Leave Messages](#)



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 wholesale price, buy directly from China

Search by Name, Brand, Model...

[Search](#)

iphone motherboard AM3 MOTHERBOARD 运动手表

Home > Hydraulic wrench square drive hollow type (need to order) Enerpac America enpark...



### Hydraulic wrench square drive hollow type (need to order) Enerpac America enparker

Original Price: USD-\$32084.07

Now: **\$18538.38** + Shipping Cost [Worldwide Delivery](#)

Color:  pump

classification:

Qty:

Remark:

[Add to Cart](#)



## Enparker Hydraulic Hose



A close-up image of a black hydraulic hose with a brass-colored metal fitting. The fitting has a threaded section and a flared end. The text 'cucheng.en.alibaba.com' is overlaid on the image.

### High Quality Enparker Hydraulic hose

FOB Price: **US \$0.1 - 10 / Meter** | [Get Latest Price](#)

Min.Order Quantity: 200 Meter/Meters High Quality Enparker Hydraulic hose

Supply Ability: 200000 Mile/Miles per Month High Quality Enparker Hydraulic hose

Port: DALIAN

Payment Terms: L/C,D/A,D/P,T/T,Western Union,MoneyGram

[Contact Supplier](#) [Chat Now!](#)

## Enparker Hydraulic Hose with Good Price



A close-up image of a black hydraulic hose with a white label that reads 'ManNo1 DIN EN853-3S1N DIN2353'. The text 'cnrubberhose.en.alibaba.com' is overlaid on the image.

### Enparker Hydraulic hose with Good Price in China

FOB Price: **US \$0.5 - 2 / Meter** | [Get Latest Price](#)

Min.Order Quantity: 100 Meter/Meters

Supply Ability: 30000 Meter/Meters per Week

Port: TIANJIN

Payment Terms: L/C,T/T,Western Union,paypal

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